

EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

ANDREW L. COLBORN,)
)
Plaintiff,)
)
vs.) No. 19-CV-484
)
NETFLIX, INC., CHROME)
MEDIA, LLC, f/k/a)
SYNTHESIS FILMS, LLC,)
LAURA RICCIARDI, and)
MOIRA DEMOS,)
)
Defendants.)
-----)

* * * C O N F I D E N T I A L * * *

June 30, 2022

10:40 a.m.

Deposition of MARY MANHARDT, held at
the offices of Veritext, 7 Times Square, New
York, New York, pursuant to subpoena and
notice, before Laurie A. Collins, a Registered
Professional Reporter and Notary Public of the
State of New York.

A P P E A R A N C E S:

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- and -

1 A P P E A R A N C E S (continued):

2
3 BALLARD SPAHR LLP

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7 BY: LEITA WALKER, ESQ.

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15 Attorneys for Defendants Chrome Media,

16 Laura Ricciardi, and Moira Demos

17 355 South Grand Avenue, Suite 2450

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19 BY: KEVIN L. VICK, ESQ.

20 (via videoconference)

21 kvick@jassyvick.com

22 MEGHAN FENZEL, ESQ.

23 (via videoconference)

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25

1 A P P E A R A N C E S (continued):

2

3 ALSO PRESENT:

4 MOIRA DEMOS (via videoconference)

5 LAURA RICCIARDI

6 MINDY LeMOINE, ESQ. (Netflix)

7 (via videoconference)

8 SUE JOHNSON, Paralegal (Conway)

9 (via videoconference)

10 ZEF COTA, Videographer

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1 to Miles scanning the 2007-'15 SA case file pulls
2 for you.

3 Do you see that?

4 A. Yes.

5 Q. Was it your understanding that was a 03:10:40
6 reference to the civil case file materials?

7 MR. VICK: Objection, lacks foundation,
8 calls for speculation.

9 A. I have no idea. But, again, because
10 this is -- it might have been any, I don't know, 03:10:56
11 post-conviction stuff. I really don't have a
12 clue. But it was for 8 that became 10.

13 Q. I'm just trying to figure out how much
14 of the various court file materials you reviewed
15 with respect to the various cases. 03:11:21

16 What do you recall -- strike that.

17 Do you recall having, for example, for
18 the Avery civil case access at any time to all of
19 the case file materials that were obtained from
20 the civil case clerk? 03:11:36

21 A. No. If I were to go through all that
22 stuff, we'd still be editing. It was -- it was --
23 that is outside the editor's purview. I will say,
24 however, that when -- any time I had a question
25 about chronology, Laura brought in all the 03:11:55

1 documents and showed me how they figured out what
2 happened when so -- I was more confident than I
3 have ever been on an editing job that what was
4 given to me was, you know -- had been looked at
5 extremely closely. 03:12:16

6 Q. So is it accurate to say that -- strike
7 that.

8 I'm just backing up to this idea of the
9 editor's purview. Is it accurate to say that the
10 directors would generally identify the source 03:12:36
11 material that they would like included in a
12 particular scene?

13 A. If it is something that has source
14 material, if it is something that is documented
15 the way many aspects of this story were 03:12:50
16 documented. And I worked on things that have zero
17 documentation because it's a story about a family,
18 you know, so, you know, that's not -- this is not
19 a situation that occurs constantly. There are
20 subject matters that do have this. 03:13:08

21 Q. Sure.

22 A. Yeah.

23 Q. The practice I just described was
24 appropriate here but might not be in other cases?

25 A. The practice of the directors getting 03:13:19

C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF NEW YORK)

I, LAURIE A. COLLINS, a Registered
Professional Reporter and Notary Public
within and for the State of New York, do
hereby certify:

That MARY MANHARDT, the witness whose
deposition is hereinbefore set forth, was
duly sworn by me and that such deposition
is a true record of the testimony given by
the witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage and that I am
in no way interested in the outcome of this
matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 13th day of July 2022.



LAURIE A. COLLINS, RPR